easily solved. One clear-cut line has been drawn. No enterprise ordinarily regarded as private becomes a governmental function simply because undertaken by a state. *South Carolina* v. *United States*, 199 U. S. 437. See 19 HARV. L. REV. 286. The principal case suggests that there is no corresponding limitation when an otherwise private industry is indulged in by the national government. Whatever the latter does, it does by virtue of its express or implied powers, and is supreme, even though what it has undertaken to do conflicts with what would otherwise be within the constitutional power of the state. *Veazie Bank* v. *Fenno*, 8 Wall. (U. S.) 533. *Cf. Briscoe* v. *Bank of Kentucky*, 11 Pet. (U. S.) 257. See 23 HARV. L. REV. 465. Nowhere is the independence of the federal government better recognized than in its relations with the Indians. In this field its control is exclusive. *Worcester* v. *Georgia*, 6 Pet. (U. S.) 515. See *Cherokee Nation* v. *Georgia*, 5 Pet. (U. S.) 1, 17; *United States* v. *Holliday*, 3 Wall. (U. S.) 407, 417. Accordingly, whatever it undertakes in their behalf it will see through, despite attempted interference by state taxing power. This freedom from state taxation, however, is limited narrowly to the accomplishment of the federal purpose. *Railroad Co.* v. *Peniston*, 18 Wall. (U. S.) 5; *National Bank* v. *Commonwealth*, 9 Wall. (U. S.) 353. Hence, in the principal case, the court intimates that a tax on the coal after it had become the personal property of the lessee would be valid. See *Thomas* v. *Gay*, 169 U. S. 264, 273.

TAXATION — WHERE PROPERTY MAY BE TAXED — SUCCESSION TAX ON SECURITIES TEMPORARILY REMOVED FROM THE STATE. — The testatrix, who was domiciled in Florida, carried on a loaning business in Iowa through an agent there. The notes and mortgages securing the loans, which had been kept in Iowa, were removed, a short time before the testatrix's death, to a bank across the state line. *Held*, that they are subject to the Iowa inheritance tax. *In re Adam's Estate*, 149 N. W. 531 (Ia.).

An inheritance tax is the price exacted by the state for conferring the privilege of inheriting property by will or descent. Accordingly, the state where the property is located may tax its succession. *Matter of Whiting*, 150 N. Y. 27, 44 N. E. 715. But a mere chose in action, being intangible, properly has no *situs* anywhere. See 27 HARV. L. REV. 107, 113. Least of all can it be said to be located in the obligor's hands. *State Tax on Foreign Held Bonds*, 15 Wall. (U. S.) 300. Therefore a debt owed to a foreign decedent is not, as such, subject to an inheritance tax. *Matter of Preston*, 75 N. Y. App. Div. 250, 78 N. Y. Supp. 91. But see *Contra, In re Joyslin's Estate*, 76 Vt. 88, 56 Atl. 281. However, if the debt is represented by a specialty, the specialty itself, being capable of *situs*, may be taxed wherever found. *New Orleans* v. *Stempel*, 175 U. S. 309; *Wheeler* v. *Sohmer*, 233 U. S. 434. See 28 HARV. L. REV. 104. This reasoning will account for the principal case only on the assumption that the securities were removed from the state in order to evade taxation. See *Buck* v. *Beach*, 206 U. S. 392, 408; *Poppleton* v. *Yamhill County*, 8 Ore. 337. In any event, however, the capital employed in the loaning business, as measured by the notes, was in a sense the testatrix's stock in trade, with a *situs* in Iowa, and upon this ground also the tax may be upheld. *Metropolitan Life Ins. Co.* v. *New Orleans*, 205 U. S. 395. See 28 HARV. L. REV. 214.

TORTS — INTERFERENCE WITH BUSINESS OR OCCUPATION — JUSTIFICATION: STRIKE TO COMPEL DISCHARGE OF NON-UNION MEN. — The defendants, members of a trade union, by threatening a strike, induced their employers to discharge the plaintiffs, and to refuse to reëmploy them on the ground that they had refused to join the union. *Held*, that the plaintiffs are entitled to damages and to an injunction. *Fairbanks* v. *McDonald*, 106 N. E. 1000 (Mass.).

The temporal interests of both workingmen and employers are protected